

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:18-CR-452-1-FL

UNITED STATES OF AMERICA)	
)	
v.)	
)	UNITED STATES' AMENDED
LEONID ISAAKOVICH TEYF,)	NOTICE OF EXPERT WITNESSES

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby serves amended notice of its intention to offer, if necessary, expert testimony during its case-in-chief in the above-referenced matter. The government believes that at least some of the testimony in question may not actually merit treatment as “expert testimony” within the intendment of the rules. See Fed. R. Evid. 701 – 703, but notice is given in an abundance of caution to avoid undue surprise.

The government gives notice of a change in the identity of the Senior Immigration Service Officer who will be called to testify regarding Leonid Teyf's application for visas to the United States, including his I-140 application. Previously, the government gave notice it would be calling Mr. Gary Freitas for this purpose, and that he would also testify regarding all defendants' actions as related to defendants TIMOFEEV's and TIMOFEEVA's work activity while here on Timofeeva's student visa, and that such activity was contrary to the terms of the visa. Mr. Frietas is unavailable to testify, and the government will call Mr. L.V. Dyer, also a Senior Immigration Services Officer, for these same purposes. His c.v. is forwarded this date to defense.

The government gives notice that previous notice identified a “Staff Linguist, Federal Bureau of Investigation Language Services,” would be called by the

government. This witness will be FBI Language Analyst Marina Parsegova. As previously disclosed, she will testify regarding the translation of the Russian language utilized in various recordings. The resulting transcripts, which will constitute the specifics of the linguist's testimony, have been previously provided to defendant as translated by a number of staff linguists; one such linguist will prepare the final transcripts to be used as exhibits, and his/her identity and curriculum vitae will be provided forthwith. This testimony is anticipated to be completely factual in nature, but does stem from specialized knowledge. As noted previously, this notice is given in an abundance of caution. Ms. Parsegova's c.v. is also provided defense this date.

In all other respects, the previous notice of experts remains correct.

Respectfully submitted this 3rd day of March, 2020.

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CERTIFICATE OF SERVICE

This is to certify that I have this the 3rd day of March 2020, served a copy of the foregoing Amended Notice of Expert Testimony upon the counsel for the defendants in this action by electronically filing the foregoing with the Clerk of Court, using the CM/ECF system.

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